



RISK MANAGEMENT PLAN

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Risk Management Plan

Risk Management Philosophy

North Country Health Consortium (NCHC) has embraced a collaborative, strategic approach to risk management, which includes identifying and addressing the threats and opportunities the organization faces. The views and participation of personnel at all levels of the organization, including volunteers, will be sought as NCHC identifies risk management priorities and implements strategies for modifying, retaining or financing risk.

Risk Management Goals

NCHC seeks to involve appropriate personnel at all levels of the organization in the identification of risks and creation of practical strategies to make certain that the organization's approach to risk management considers diverse perspectives and staff understand their roles and responsibilities in protecting the mission and assets of the organization.

General Safety Principles

- NCHC strives always to operate in compliance with local, state, and federal laws and regulations.
- All adults involved in NCHC bear responsibility for the health, safety, and security of service recipients. This is a primary responsibility of the Board of Directors, Chief Executive Officer, management team, program staff, volunteers, and student interns.
- Purchasing insurance coverage as a financing mechanism for certain risks, while also recognizing that insurance is not a substitute for vigilance in planning and implementing program
- Safety and risk management activities are multi-faceted and include:
 - Thoughtful screening, selection and training of employed staff and volunteers
 - Creation and enforcement of policies, standards, guidelines, and procedures as guides for planning and responding
 - Maintaining safe and secure facilities
 - Establishing procedures to be followed in the event of an emergency
 - Maintaining clear communications channels

Responsibility for Risk Management

- **Management Team**
 - Champions the organization-wide efforts to protect the vital assets of NCHC and engage key stakeholders in risk management activities as needed
 - Convenes periodically to review the agency's priority risks and corresponding risk management strategies in the following areas: Human Resources, Client Safety, Emergency Procedures, Financial Management, Facility/Site Safety and Security, Technology and information Management, Transportation, Crisis Management, Volunteer Risks and Risk Management Strategies, and Insurance Program
 - Reviews the organization's *Risk Management Plan* annually
- **Chief Executive Officer**
 - Assigns staff to design and carry out safety and risk management activities
 - Assigns staff to perform annual review of the safety and risk management activities

- Executes contracts for the organization
- Keeps the board apprised of emerging threats and opportunities facing the organization
- **Chief Financial Officer**
 - Develops, implements and monitors loss prevention programs
 - Conducts contract reviews and coordinates the purchase of insurance
 - Monitors and evaluates the insurance program, maintaining appropriate funding levels, accurate loss forecasting, claims management, loss prevention and cost containment programs
- **Legal Counsel for the Organization**
 - Serves as advisor to the Chief Executive Officer and Board of Directors in legal matters, making referrals to specialists on an as needed basis.

Human Resources

Written Employment Policies

NCHC has an Employee Handbook that is distributed to all incoming staff on their first day of employment. Employees are required to acknowledge that they have received, read, and understand the Handbook and agree to abide by the policies therein. It is the organization's policy to review the Handbook carefully prior to taking any disciplinary action against an employee to ensure that the organization's policies have been followed. Employees who have questions or concerns about any of the policies contained in the Handbook are encouraged to speak with their direct supervisor or the Chief Executive Officer.

Communicating Policy Changes

All new policies are communicated in writing to staff by email, are uploaded to the electronic version of the Employee Handbook, and are incorporated in other appropriate policy documents. New policies are incorporated in the policy manual when that manual is updated periodically.

Policy Review and Updating

As a CARF accredited organization, NCHC reviews and updates its Employee Handbook every year to ensure that policies remain suitable for the organization and in compliance with state and federal employment laws. The organization obtains assistance from an employment attorney in this effort if necessary.

Use of Position/Job Descriptions

NCHC has developed job descriptions for all paid and volunteer positions in the organization. These documents are developed by supervisory personnel and updated on an as needed basis.

Applications

- NCHC uses an application form for paid and volunteer positions.

Reference Checks

- NCHC's screening process includes checking references for finalists for paid positions and student interns, contract and volunteer positions depending on the requirements of the position or services.

Criminal History Background Checks

- It is the policy of NCHC to conduct criminal history background checks on all applicants for all paid employment and for volunteer service if direct care or personal care is required for the position. The results of these checks are reviewed against the organization's eligibility criteria to determine whether any applicants must be excluded due to the results of the background check.

Orientation Process for New Employees

NCHC offers a multi-faceted orientation process which includes:

- An in-person introduction to the organization and facility tour
- An introduction to staff and an overview of equipment and systems required for use
- An online orientation that includes an overview of NCHC as well as modules covering workplace health and safety issues, corporate compliance, ethics and NCHC's Ethical Code of Conduct, cultural diversity, incident reporting, harassment and emergency procedures. These modules are expected to be completed over the course of the first week of employment. Additional modules are required for all direct care staff at orientation.
- Employment paperwork, benefits enrollment and Employee Handbook review

Ongoing Supervision

NCHC provides ongoing supervision for all staff with particular attention to ensure that any additional clinical supervision requirements are met. Clinicians are expected to participate in formal supervision at least monthly and to abide by their professional group's code of conduct. Through its "Ongoing Clinical Supervision" policy, NCHC aims to provide direct care staff with a confidential, safe and supportive environment, to critically reflect on professional practice; to improve quality client services by improving mental health practice.

Performance Appraisal

NCHC requires annual reviews for all employees. Supervisors are responsible for scheduling review meetings and completing the Performance Review form. A goal-setting review of the previous evaluation period and goals for the next evaluation period is part of this process.

Client Safety

Client Safety Policy

NCHC Health and Safety Policies include:

- Emergency Disaster Plan and Procedures
- Emergency First Aid Expertise and Equipment
- Infection Control
- Universal Precautions
- Handling, Storage and Disposal of Hazardous Materials

Each policy is reviewed during employee orientation and reviewed annually.

Ethical Code of Conduct

NCHC Ethical Code of Conduct is discussed at orientation and on an annual basis. All employees are expected to maintain acceptable job performance and to conduct themselves in a professional and courteous manner adhering to the Ethical Code of Conduct. Professional service providers are expected to comply with any codes for professional conduct or ethical behaviors adopted by their respective licensure or certification authorities.

Client Rights and Responsibilities

All individuals requesting services from NCHC have a right to receive such services without regard to race, ethnicity, age, color, religion, creed, gender, gender identity, national origin, sexual orientation, veteran status, financial condition, handicap or disability, HIV infection - whether asymptomatic or symptomatic, AIDS-related complex or AIDS. No distinction will be formulated in determining eligibility for participation in services provided by NCHC based on any of these identifiers, conditions or circumstances.

All individuals receiving services from NCHC shall be given a Client Handbook which includes a statement of client rights and responsibilities as part of the intake and initial orientation process. The statement of client rights and responsibilities is provided again on an annual basis while in treatment. Said statement shall conform to all applicable regulations issued by State, Federal and other funders.

Interpersonal Relationships and Program Boundaries

NCHC serves people vulnerable to additional abuse, mistreatment and exploitation. To protect all, NCHC limits contact between clients and staff to approved activities. Staff should not meet with a client outside the parameters of the organization. Specific limitations are detailed below:

- Staff cannot meet with a client and/or the client's family other than during scheduled program activities.
- Staff cannot include anyone other than an authorized employee in any program activities involving clients. Clients cannot include members of their families or friends in any program activities unless specifically permitted.

- No employees or other persons associated with NCHC will accept excessive gifts of money or material values, favors remuneration, or other consideration from any client, individual, or organization that does business with NCHC.

Emergency Procedures

To ensure the safety of our clients, NCHC has established an emergency action plan. The emergency action plan is a way for NCHC to prepare and plan for various emergencies. All personnel are responsible for knowing and following the plan. Each NCHC site must schedule and hold emergency drills to test the plan and ensure its readiness in the event of an emergency.

Client Discipline

To protect the health and safety of all persons involved in our programs, NCHC enforces the Client Rights and Responsibilities policy. Violations may result in clients being suspended from programs and, if conduct is severe or repeated, removal from the program.

Financial Management

Financial Responsibilities and Objectives

It is the responsibility of the Chief Financial Officer to formulate financial policies and review the operations and activities of NCHC on a periodic basis. The Chief Executive Officer of the organization acts as the primary fiscal agent, with responsibility for implementing all financial management policies and procedures on a day to day basis. The Chief Executive Officer may delegate to qualified professional staff responsibility for managing various aspects of financial management.

The financial management objectives of NCHC are to:

- Preserve and protect financial assets needed for mission critical activities
- Exercise appropriate care in the handling of incoming funds and disbursement of outgoing funds
- Strive for transparency and accountability in fiscal operations

Budgeting

The Chief Executive Officer shall be responsible for developing and presenting a proposed budget for the upcoming fiscal year to the Finance Committee. The Finance Committee shall review and approve the budget and present it to the board. The budget shall contain detailed projections for revenues and expenditures as well as cash flows.

Financial Statements

NCHC's financial statements shall be prepared on an accrual basis in accordance with Generally Accepted Accounting Principles (GAAP). Under GAAP, net assets and revenues, expenses, gains and losses are classified based on the existence or absence of funder-imposed restrictions. The net assets of the organization and changes shall be classified as unrestricted, temporarily restricted or permanently

restricted. Separate funds may be established for specific purposes.

The Chief Executive Officer shall prepare or direct the preparation of monthly Financial Statements and presentation of these statements to the Finance Committee. Monthly financial statements shall be presented to the board by the Finance Committee.

Internal Controls

NCHC has adopted many internal control measures as part of an overall effort to safeguard financial assets. These are outlined in NCHC Finance policies and procedures.

In addition, and to the extent possible given its size and circumstances, the organization strives to segregate the following duties so that a single staff member isn't required to perform two or more of the following incompatible functions:

- Authorizing the purchase of goods and services
- Preparing a purchase order to purchase goods
- Receiving goods or validating the performance of services
- Approving the payment of accounts payable for goods and services received
- Recording the liability for accounts payable
- Preparing and signing checks to pay the respective accounts payable
- Forwarding payments to the payee

Audit

It is the policy of NCHC to engage the services of a reputable, independent CPA firm to conduct an annual review of the organization's financial statements. The review is required to be completed within six months of the end of each fiscal year. The CPA firm is selected by and reports to the organization's Chief Executive Officer.

Facility/Site Safety and Security

Facility Needs

NCHC seeks to utilize its resources and assets fully in achieving its mission. The prudent use of facilities and resources is required to protect the safety and well-being of all personnel - including staff, volunteers and service recipients - while safeguarding the organization's financial assets.

Inspections

To ensure the safety of our operations, NCHC inspects its facilities on a regular basis to ensure compliance with regulations, accreditation standards, and our own principles.

Emergency Planning Policy

It is the policy of NCHC to promote good health, well-being and occupational safety for its employees, volunteers and service recipients. Each staff member is trained in emergency evacuations and safety beginning at the time of orientation and annually thereafter. Certain responsibilities are defined to ensure smooth operations. The emergency plan must be readily available and reviewed annually by the organization's management team.

Technology and Information Management

Technology Policy

NCHC's information and office technology systems (networks, software, computers, telephones, printers, copiers, etc.) are tools provided to employees and volunteers to enhance productivity and performance on the job. Regardless of the type of use, employees must not have any expectation of privacy to data, information or files that are created, stored or used on NCHC's systems. The Chief Executive Officer or his/her designee reserve the right to access the employee's computer or files at any time. Staff is expected to use good judgment in their use of NCHC's information and office technology systems, especially electronic mail. Access to all systems, including electronic mail and the Internet, is a privilege, not a right.

Examples of inappropriate uses of technology include:

- Any violation of law or government regulation
- Any unauthorized access to computer systems or networks
- Any use promoting disrespect for an individual, discrimination, or any use constituting a personal attack, including ethnic jokes or slurs
- Viewing, copying or transmitting material with sexual or profane content
- Transmitting harassing or soliciting messages
- Transmitting unsolicited advertising
- Using copyrighted material without permission or legal rights
- Any use for personal financial gain, or in a manner creating a potential conflict of interest for the employee or NCHC
- Defamatory, inflammatory or derogatory statements about individuals, companies or their products
- Any use that constitutes a waste of NCHC's resources, including network resources

- Sending or forwarding chain letters
- Any use of network systems for recreational games or other recreational purposes
- Any use that involves corruption or destruction of data, including knowingly launching a virus, worm or other malicious software

The failure to use good judgment or the abuse of the organization's policies may result in suspension of privileges or disciplinary action. If any employee discovers he or she has unintentionally violated this policy, that employee should notify his or her supervisor immediately.

Transportation

Authorized Vehicle Use Policy

Providing transportation services to clients is a mission-critical function. However, the organization recognizes its responsibility to provide safe and efficient transportation. NCHC complies with all Federal and State Department Transportation and Department of Safety regulations. The following rules apply to all drivers and vehicles:

- Only people approved and authorized by NCHC are permitted to drive either an organization owned/leased vehicle or any other vehicle on the organization's behalf.
- Agency owned vehicles are not to be driven for personal use without the permission of the Chief Executive Officer or his/her designee.
- Personal errands are not allowed while driving on behalf of organization.
- NCHC owned/leased vehicles are to be used within the approved guidelines for use.

Driver Selection Policy

The purpose of our Driver Selection process is to screen and identify qualified drivers while restricting or eliminating unacceptable drivers. All employees and volunteers that drive either an agency-owned vehicle, a rented vehicle or a personal vehicle on behalf of NCHC *must be approved* to drive *before* they are permitted to drive for the organization.

The driver selection process includes the review of:

1. The employee or volunteer's driver's license for currency and validity
2. Any license restrictions that might render the employee or volunteer ineligible as a driver
3. The individual's motor vehicle record (MVR)
4. Proof of adequate personal automobile insurance

Driver Training Policy

NCHC recognizes the importance of training its drivers. All approved drivers must complete an online driver safety course and an orientation to NCHC Transportation Procedures prior to being permitted to drive for the organization. In addition, all approved drivers must participate in ongoing driver training programs as scheduled by the organization from time to time.

Driver Supervision

Persons who drive on NCHC's behalf are subject to oversight by their direct supervisor. As part of the regular performance review process, driver performance will be assessed annually and continuing eligibility to drive will be verified. This verification will include review of a current Motor Vehicle Report (MVR) to ensure that the driver meets the organization's minimum eligibility requirements, and a review of the complaint log to determine if any corrective action is required.

Vehicle Maintenance

NCHC has assigned responsibility to a regular staff member who ensures that all agency-owned vehicles are maintained and repaired. The vehicle supervisor oversees maintenance and repair procedures, such as:

- *Mileage and maintenance log.* Each vehicle contains a log book for drivers to record each trip, including the driver, purpose, and miles driven. The book should also document any maintenance or repairs performed.
- *Pre-trip inspection.* A short pre-trip inspection form is completed by the driver before using the vehicle. Drivers are instructed to refer any problems to the vehicle supervisor. The supervisor also inspects vehicles periodically.
- *Routine maintenance.* The vehicle supervisor schedules and documents the routine maintenance of all vehicles (oil changes, tire rotation and replacement, fluids checked).
- *Maintenance or repair requests.* Drivers are instructed concerning the proper way to report maintenance and repair needs (flat tire, broken seat belt).

Accident Procedures

Persons authorized to drive for NCHC have been trained to follow the following procedure if they are involved in an accident while driving any vehicle for the organization:

- Tend to any medical needs. Call the police or ask a bystander to contact the police.
- Do not discuss the accident or admit fault to any other driver involved or bystander.
- Record the name, address and driver's license number of the other involved drivers, using the Vehicle Accident Form in the vehicle glove box.
- Record the license plate and make of the car on the Vehicle Accident Form.

- Record the police report number, police officer's badge number and time, date and place of accident on the Vehicle Accident Form.
- Record the names and addresses of any witnesses.
- Submit the completed Vehicle Accident Form to your supervisor prior to the close of business on the next business day.

Crisis Management

Emergency Response Policy

NCHC has adopted an Emergency Response policy whose purpose is to provide direction to the stakeholders of the organization in the wake of an emergency that may threaten the mission of the organization and the safety of its personnel and clients. The Chief Executive Officer is responsible for managing the organization's emergency response in accordance with the following priorities:

- to save lives;
- to protect health and to provide for the safety and health of all responders;
- to protect property and infrastructure;
- to protect the environment; and
- to restore the principle functions of the organization.

Vital Information Backup Policy

NCHC will develop backup procedures for protecting and preserving paper-only records and documents; electronic documents and data; and staff status availability and notification, including emergency contact information.

Crisis Communications Policy

The NCHC is committed to taking a preemptive approach to public relations crises, using disclosure whenever possible as the preferred strategy for preventing or minimizing a crisis. No one is authorized to speak to the news media during a crisis without clearance from the Chief Executive Officer. The Chief Executive Officer or his or her designee will be responsible for developing crisis communication strategies.

When a crisis unfolds, the Chief Executive Officer or designee will gather and verify information about the crisis, and will assess the severity of the matter and determine how information is to be released, who should speak for the organization (unless a spokesperson has been named and trained) and who is to be notified.

General Evacuation Policy

NCHC will protect the health and safety of its employees and clients by designing a building evacuation plan, by educating staff as to their roles and responsibilities in the event of an evacuation, and by running evacuation drills at least annually. The Safety Committee will evaluate the drills and suggest improvements to the plan.

Evacuation of Persons with Disabilities

- Each unit in the organization shall update its emergency action plan annually to reflect the number of self-identified persons with disabilities that might require special assistance during an evacuation as well as the location where they are generally resident in the building.
- The Safety Coordinator will work with the Safety Committee to develop an evacuation plan that ensures the safety of persons with disabilities during an emergency evacuation.
- The Safety Coordinator will identify the location of rescue assistance areas in the building where persons who require special help may await evacuation assistance from emergency personnel.
- Each unit will establish a buddy system and identify a principal contact and backup contact who will be paired with persons with self-identified disabilities.
- Volunteer buddies and their alternates should become familiar with the special evacuation needs of their buddies and determine an appropriate strategy for alerting and assisting their buddies if an evacuation is ordered.

Volunteer Risks and Risk Management Strategies

Addressing Risks through Recruitment, Screening and Selection

NCHC integrates risk management into its volunteer recruitment, screening and selection process by:

- Communicating to prospective volunteers the organization's requirements and expectations;
- Designing position descriptions that support the identification of appropriate screening tools based on the risks associated with a particular position;
- Employing a basic, enhanced or rigorous screening process based on an analysis of the position (for example, a volunteer position requiring contact with vulnerable clients warrants a rigorous screening process consisting of an application, interview, reference checks, and criminal history and possibly other records checks).

Supervision of Volunteers

NCHC has established clear lines of authority and supervision for the volunteers serving the organization. Volunteer performance is monitored on an ongoing basis and evaluated more formally each year.

Volunteer Dismissal

Volunteers serving NCHC may be dismissed at any time when a supervisor determines that:

- The volunteer is indifferent with regard to the organization's essential rules and requirements;
- The volunteer cannot adequately perform the job for which they have been retained;
- The volunteer's continued service presents an unacceptable danger to the organization or its personnel or clients.

At the time of dismissal, departing volunteers will be provided with a letter thanking them for their service and explaining the reason why their continued service is no longer required. All volunteer dismissals will be reviewed with the Chief Executive Officer in advance of taking action.

Insurance Program for NCHC

NCHC retains the services of insurance advisors to assist the organization purchase adequate insurance coverage at an acceptable price.

Selection Process

NCHC puts its insurance program out to bid every 3-5 years, or more frequently if the organization determines that a current provider is unable to meet the service needs of the organization.